

EXHIBIT 29



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Confidential Treatment Requested

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By Email

John Hogan
Brent Nakamura
Antitrust Division
U.S. Department of Justice
450 5th St. NW
Washington, DC 20530

February 25, 2022

Re: Civil Investigative Demand No. 30769

Dear John and Brent:

I submit this letter in connection with Civil Investigative Demand No. 30769 (“the CID”) issued to Alphabet Inc. (“Company”) for oral testimony scheduled for February 28, 2022. The Company provides this information to the Division subject to and without waiving its objections to the CID, and in accordance with Federal Rule of Evidence 612. This letter corrects counsel’s letters of September 14, 2021 and October 4, 2021 (“Previous Letters”).

As set forth in the Previous Letters, the Company objects to each of the specifications of the CID to the extent they seek information protected by the attorney-client privilege or the work product doctrine. In accordance with our correspondence of November 8, 2021 and your letter of November 9, 2021, it is the Company’s understanding that the Division has deferred CID specifications 1(e), 1(h), and 1(i), which relate to Project IDoor, Project Garamond, and Project Metta, respectively. By designating a 30(b)(6) witness to provide responsive, non-privileged testimony on behalf of the Company in response to the six undeferred projects identified in the CID (Projects SingleClick, Stonehenge, Banksy, Sunday, Monday, and Quantize, collectively the “Undeferred Projects”), the Company does not waive any of its objections and reserves the right to make assertions of attorney-client privilege and work product protection as appropriate during the deposition.



Of the Undeferred Projects, all but Project Quantize were undertaken because of and in response to active investigations into, and in anticipation of litigation concerning, the Company's ad tech business by government authorities around the globe, including:

- the U.K. Information Commissioner's Office (initiated February 2019);
- the Irish Data Protection Commission (initiated May 2019);
- the French Competition Authority (initiated July 2019);
- the U.K. Competition and Markets Authority (initiated July 2019);
- the State of Texas, leading a coalition of state attorneys general (initiated September 2019);
- the Antitrust Division of the United States Department of Justice (initiated October 2019);
- the European Commission (initiated November 2019); and
- the Australian Competition and Consumer Commission (initiated February 2020).

Project SingleClick

- Project SingleClick was an analysis of potential remedies undertaken because of and in response to active government investigations into, and in anticipation of litigation concerning, Google's ad tech business.
- Outside counsel included¹: John Harkrider, Daniel Bitton, Russell Steinthal, Leslie Overton, and David Pearl of Axinn, Veltrop & Harkrider; Jordan Ellison, Isabel Taylor, and Tina Zhuo of Slaughter & May.
- Google in-house counsel included: [REDACTED], Ted Lazarus, [REDACTED].
- Google employees included²: [REDACTED].
- Work on this project began in December 2019 and ended in February 2020. Ad tech is a dynamic industry, and active regulatory investigations into and litigation concerning Google's ad tech business have continued beyond this timeframe. Legal analysis and advice, including from U.S. and E.U.-qualified outside counsel, prepared

¹ Outside counsel for the Undeferred Projects may not have been aware of the specific project name used within the Company to describe the work.

² The extent of any individual Google employee's involvement in any of the Undeferred Projects varied considerably depending on the employee's relevant knowledge, role, level of responsibility within the Company, and whether the work undertaken in the Undeferred Projects was sufficiently fruitful to warrant further consideration or escalation.



or considered in the context of one project may resurface and be relied upon later in response to ongoing investigations and in anticipation of litigation.

Project Stonehenge

- Project Stonehenge was an analysis of potential remedies undertaken because of and in response to active government investigations into, and in anticipation of litigation concerning, Google's ad tech business.
- Outside counsel included: John Harkrider, Daniel Bitton, Russell Steinthal, Leslie Overton, Andrew Freeborn, David Pearl, and Koren Wong-Ervin of Axinn, Veltrop & Harkrider; Jordan Ellison, Tina Zhuo, and Jessica Staples of Slaughter & May.
- Google in-house counsel included: Ted Lazarus, [REDACTED]
[REDACTED].
- Google employees included: [REDACTED]
[REDACTED].
- Project Stonehenge, which evolved out of and was a further analysis of one of the concepts evaluated in Project SingleClick, began in February 2020. Work on the project was completed by June 2020. Ad tech is a dynamic industry, and active regulatory investigations into and litigation concerning Google's ad tech business have continued beyond this timeframe. Legal analysis and advice, including from U.S. and E.U.-qualified outside counsel, prepared or considered in the context of one project may resurface and be relied upon later in response to ongoing investigations and in anticipation of litigation.

Project Banksy

- Project Banksy refers to an analysis of potential remedies undertaken because of and in response to active government investigations into, and in anticipation of litigation concerning, Google's ad tech business. "Banksy" also refers to the concept underlying Header Bidding Manager, a feature designed to support demand coming into Ad Manager from header bidding. By way of further response, the Company refers the Division to the CID deposition testimony of [REDACTED]
- Outside counsel included: John Harkrider, Daniel Bitton, Russell Steinthal, Leslie Overton, and Koren Wong-Ervin of Axinn, Veltrop & Harkrider; Jordan Ellison, Tina



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Zhuo, and Juliette Sailleau of Slaughter & May; Olivier Freget of Freget Glaser & Associates.

- Google in-house counsel included: [REDACTED], Ted Lazarus, [REDACTED].
- Google employees included: [REDACTED].
- The Project Banksy remedies analysis began in spring 2020. The term “Banksy” as used to refer to the concept underlying Header Bidding Manager was in use before that time. Work on Project Banksy is ongoing.

Project Sunday

- Project Sunday was an analysis of potential remedies undertaken because of and in response to active government investigations into, and in anticipation of litigation concerning, Google’s ad tech business.
- Outside counsel included: Ethan Klingsberg of Freshfields, Bruckhaus, Deringer; John Harkrider and Daniel Bitton of Axinn, Veltrop and Harkrider.
- Google in-house counsel included: Ted Lazarus, [REDACTED].
- Google employees included: [REDACTED].
- Work on this project began in July 2020 and was largely complete in October 2020. Ad tech is a dynamic industry, and active regulatory investigations into and litigation concerning Google’s ad tech business have continued beyond this timeframe. Legal analysis and advice, including from U.S. and E.U.-qualified outside counsel, prepared or considered in the context of one project may resurface and be relied upon later in response to ongoing investigations and in anticipation of litigation.
- Outside consultants: In the summer of 2020, Lazard, under its general January 18, 2017 retainer agreement with Google, provided Google’s corporate development team



with a general overview of the ad tech industry. Lazard was not engaged to work on Project Sunday and did not participate in the Project Sunday analysis.

Project Monday

- Project Monday evolved out of Project Sunday. Project Monday, like Project Sunday, was an analysis of potential remedies undertaken because of and in response to active government investigations into, and in anticipation of litigation concerning, Google's ad tech business.
- Outside counsel included: John Harkrider, Andrew Freeborn, and Daniel Bitton of Axinn, Veltrop and Harkrider; Jordan Ellison and Jessica Staples of Slaughter & May.
- Google in-house counsel included: Ted Lazarus, [REDACTED]
[REDACTED]
[REDACTED].
- Google employees included: [REDACTED]
[REDACTED].
- Work on this project began in March 2021 and ended in May 2021. Ad tech is a dynamic industry, and active regulatory investigations into and litigation concerning Google's ad tech business have continued beyond this timeframe. Legal analysis and advice, including from U.S. and E.U.-qualified outside counsel, prepared or considered in the context of one project may resurface and be relied upon later in response to ongoing investigations and in anticipation of litigation.

Project Quantize

- Project Quantize was a request for legal advice regarding privacy concerns and GDPR from the product team to Google's in-house counsel.
- Google in-house counsel included: [REDACTED]
[REDACTED], Ted Lazarus, [REDACTED].
- Google employees included: [REDACTED]
[REDACTED].



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[REDACTED]

- Work on Project Quantize began in October 2020 and ended in February 2021.

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The Company requests confidential treatment of this information to the fullest extent allowed by law, including the Antitrust Civil Process Act, 15 U.S.C. § 1311 et seq., Exemption 4 of the Freedom of Information Act, as well as all other applicable statutes, regulations, and customary confidentiality policies. The Company specifically requests advance notice before disclosure of this information to any person.

Please do not hesitate to contact me with any questions.

Sincerely yours,

/s/ Julie Elmer